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11 *Attorneys for the United States of America*

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

10  
11 Omar Qazi  
12 Plaintiff,  
13 v.  
14 United States of America, Department of  
15 Justice, Bureau of Prisons, State of Nevada,  
16 Department of Corrections, Does 1 through 20,  
inclusive.  
17 Defendants.

Case No. 2:23-cv-00052-RFB-VCF  
  
**Stipulation to Extend Defendants'  
Answering Deadline  
(First Request)**

18 Plaintiff Omar Qazi, Defendant United States of America, Department of Justice, Bureau  
19 of Prisons (“United States”), and Defendant State of Nevada, Department of Corrections (“State  
20 of Nevada”) stipulate that the Defendants’ deadline to answer or otherwise respond to Plaintiff’s  
21 complaint will be March 6, 2023, which is 60 days after the United States removed this action to  
22 federal court. The purpose of the stipulation is to allow the United States and the State of Nevada  
23 adequate time to investigate this case before answering or otherwise responding to the complaint.  
24 In addition, the parties request a response date that applies to both the United States and State of  
25 Nevada so that the responses are not staggered. This is the parties’ first stipulation to extend time  
26 for the Defendants to answer or otherwise respond to the complaint.

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1 The parties further stipulate that if the Defendants file motions to dismiss this case, Plaintiff  
2 shall have until April 17, 2023, to respond to such motions so that Plaintiff will have adequate  
3 time to research the legal issues and because Plaintiff's counsel has a trial scheduled for the end of  
4 March that may interfere with responding to such motions.

5 IT IS SO STIPULATED.

6 Dated: February 9, 2023

7 Dated: February 9, 2023

8 MICHAEL P. BALABAN  
9 Law Offices of Michael P. Balaban

JASON M. FRIERSON  
United States Attorney

10 /s/ Michael P. Balaban  
11 Michael P. Balaban  
12 Attorney for Plaintiff

13 /s/ Stephen R. Hanson II  
14 Stephen R. Hanson II  
15 Assistant United States Attorney

16 Dated: February 9, 2023

17 NEVADA ATTORNEY  
18 GENERAL'S OFFICE

19 /s/ Douglas Rands  
20 Douglas Rands  
21 Deputy Nevada Attorney General

22 IT IS SO ORDERED:

23   
24 United States Magistrate Judge

25 2-9-2023  
26 Dated: \_\_\_\_\_

## **Certificate of Service**

I hereby certify that on February 9, 2023, I electronically filed and served the foregoing Stipulation to Extend Defendants' Answering Deadline with the Clerk of the Court for the United States District Court for the District of Nevada using the CM/ECF system, as well as served a copy via first class, regular mail as follows:

Nevada Attorney General's Office  
Douglas Rands  
Deputy Attorney General  
100 N. Carson Street  
Carson, NV 89701